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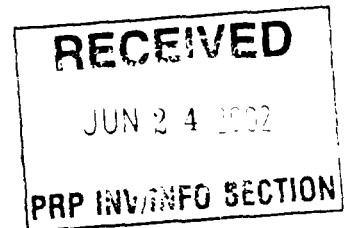


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U.S. CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 20, 2002

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029



**RE: Request for Information Pursuant to Section 104(e) of CERCLA
(42 U.S.C. Section 9604)
Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill
and Folcroft Landfill Annex, Delaware and Philadelphia Counties, Pennsylvania**

Dear Ms. Prisk:

Crompton Corporation ("Crompton") received a CERCLA Section 104(e) supplemental information request from Henry J. Sokolowski, U.S. EPA Region III, dated May 13, 2002 ("Supplemental Information Request") relating to the above-referenced site ("Site"). Subsequently, you agreed that Crompton could have an extension of time until June 20, 2002 as confirmed in my letter to you of May 23, 2002. This letter constitutes the response of Crompton to your Supplemental Information Request.

As a preliminary matter, Crompton reiterates and incorporates its objections in Crompton's April 12, 2002 104(e) response. Also, to the extent that the Supplemental Information Request seeks information concerning Crompton's status as a successor, Crompton objects to the same in that such requests exceed the scope of US EPA's authority set forth in 42 USC 9604 [Sec. 104(e)]. Subject to and without waiving this objection, Crompton responds as follows.

Crompton objects to Requests for Information 1, 2 and 3 as vague, overly broad and unduly burdensome. Subject to and without waiving this objection, Crompton agrees to produce a copy of the asset purchase and environmental agreements related to each transaction:

- "Agreement of Purchase and Sale of Assets – Continental Oil Company with Witco Chemical Corporation", and "Exhibit J – Environmental Matters";
- "Asset Purchase Agreement dated as of the 30th day of June, 1998 between Witco

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CONFIDENTIAL
(REC'D)

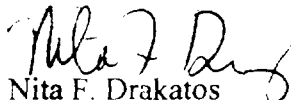
Corporation, Witco Canada, Inc. and Witco B.V. and Stoney Creek Technologies, LLC”;

- “Environmental Agreement dated as of June 30, 1998 between Witco Corporation and Stoney Creek Technologies, LLC”;
- “Agreement and Plan of Reorganization by and among Crompton & Knowles Corporation Park Merger Co. and Witco Corporation” dated as of May 31, 1999 – Appendix A of the S-4 Report filed with the US Securities and Exchange Commission of the July 24, 1999.

Except with respect to the referenced May 31, 1999 Agreement and Plan of Reorganization, Crompton asserts a claim of business confidentiality with respect to the enclosed materials pursuant to 40 CFR Part 2. Each document is so stamped. Crompton objects to US EPA’s disclosure of such information to its contractors and grantees except in accordance with law.

With respect to question # 4, Crompton is unaware of any evidence that the alleged disposal activities occurred during any time when Crompton owned the Trainer facility. With regard to alleged waste disposal activities prior to Crompton’s acquisition of the Trainer facility, among other things, Crompton is not a successor to any such related liabilities which may exist because Witco Chemical Corporation simply acquired certain assets from Continental Oil Company.

Sincerely yours,



Nita F. Drakatos
Paralegal